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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Amendment of the Amateur Service
Rules Concerning the 222-225 MHz
and 1240-1300 MHz Frequency Bands

PR Docket 92-289

COMMENTS ON NOTICE OF PROPOSED RULE MAKING

My comments are directed to the American Radio Relay League (ARRL) proposal (RM-7869) to prohibit auxiliary operation in the 222.00-222.15 MHz frequency range.

As a user of the Northern California/Nevada DX Packet Spotting Network (DXPSN), I would be disenfranchised from my present ability to communicate with other such users in Nevada, should the proposed changes to 97.201(b) be enacted as proposed.

DXPSN has followed generally accepted coordination procedures in securing its 222.140 MHz link frequency between California and Nevada, and, due to congestion and the "weak signal" nature of the link, no substitute frequencies are available between 222.15 MHz and 225.00 MHz. The link in question is a 105 mile knife-edge path (spanning the Sierra Nevada Mountains) with multiple obstructions which cannot be moved to available frequency bands above 225 MHz as the intrinsic additional losses would make the path unusable.

Therefore, I request that if 97.201(b) is changed, that auxiliary operations on 222.14 MHz be allowed to continue by reducing the upper limit of the frequency range excluded from auxiliary stations to 222.13 MHz or lower, rather than 222.15 MHz as proposed.

Respectfully submitted,

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